

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	DATE FILED: _____
v.	:	CRIMINAL NO. _____
LARRY V. CRENSHAW,	:	VIOLATIONS:
a/k/a "Larry Tate,"	:	18 U.S.C. § 371 (conspiracy to counterfeit
TARA D. GROOMES	:	and deal in counterfeit United States
	:	currency - 1 count)
	:	18 U.S.C. § 471 (counterfeiting
	:	United States currency - 2 counts)
	:	18 U.S.C. § 473 (dealing in counterfeit
	:	United States currency - 2 counts)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. From in or about September 2007, to in or about October 2007, in the Eastern District of Pennsylvania,

**LARRY V. CRENSHAW,
a/k/a "Larry Tate," and
TARA D. GROOMES**

conspired and agreed to commit an offense against the United States, that is, to falsely make, forge, and counterfeit obligations of the United States with intent to defraud, and to knowingly sell, transfer, and deliver counterfeit obligations of the United States, in violation of Title 18, United States Code, Sections 471 and 473.

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendants LARRY V. CRENSHAW, a/k/a "Larry Tate," and TARA D. GROOMES scanned genuine United States currency onto an all-in-one printer/scanner/copier.

3. Defendants LARRY V. CRENSHAW, a/k/a “Larry Tate,” and TARA D. GROOMES printed counterfeit United States currency from the scanned image of genuine United States currency.

4. Defendants LARRY V. CRENSHAW, a/k/a “Larry Tate,” and TARA D. GROOMES sold the counterfeit United States currency in exchange for approximately thirty to forty percent of its face value.

OVERT ACTS

In furtherance of the conspiracy, defendants committed the following overt acts in the Eastern District of Pennsylvania:

1. On or about October 9, 2007, defendants LARRY V. CRENSHAW, a/k/a “Larry Tate,” and TARA D. GROOMES scanned a genuine \$20 Federal Reserve Note onto an all-in-one printer/scanner/copier.

2. On or about October 9, 2007, defendants LARRY V. CRENSHAW, a/k/a “Larry Tate,” and TARA D. GROOMES printed 25 counterfeit \$20 Federal Reserve Notes from the scanned image, and sold them for a total of \$180 in genuine United States currency.

3. On or about October 9, 2007, defendant TARA D. GROOMES stated that future transactions involving the sale of counterfeit United States currency should be negotiated directly with defendants GROOMES and LARRY V. CRENSHAW, a/k/a “Larry Tate.”

4. On or about October 9, 2007, defendants LARRY V. CRENSHAW, a/k/a “Larry Tate,” and TARA D. GROOMES agreed to print and sell thousands of additional dollars in counterfeit United States currency the following week.

5. On or about October 15, 2007, defendant LARRY V. CRENSHAW, a/k/a “Larry Tate,” confirmed that he will have at least \$4,000 in counterfeit United States currency available for sale.

6. On or about October 18, 2007, defendants LARRY V. CRENSHAW, a/k/a "Larry Tate," and TARA D. GROOMES printed 141 counterfeit \$20 Federal Reserve Notes from a scanned image, and sold them for a total of \$1,000 in genuine United States currency.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 9, 2007, at Philadelphia, in the Eastern District of Pennsylvania, defendants

**LARRY V. CRENSHAW,
a/k/a “Larry Tate,” and
TARA D. GROOMES,**

with intent to defraud, falsely made, forged, and counterfeited, and aided and abetted the false making, forging, and counterfeiting of, obligations of the United States, that is, 25 counterfeit \$20 Federal Reserve Notes, Series 2006, Serial No. IC 03228146 A.

In violation of Title 18, United States Code, Sections 471 and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 18, 2007, at Philadelphia, in the Eastern District of Pennsylvania, defendants

**LARRY V. CRENSHAW,
a/k/a “Larry Tate,” and
TARA D. GROOMES,**

with intent to defraud, falsely made, forged, and counterfeited, and aided and abetted the false making, forging, and counterfeiting of, obligations of the United States, that is, 141 counterfeit \$20 Federal Reserve Notes, Series 2006, Serial No. IC 43971668 B.

In violation of Title 18, United States Code, Sections 471 and 2.

COUNTS FOUR AND FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about the following dates, at Philadelphia, in the Eastern District of Pennsylvania, defendants

**LARRY V. CRENSHAW,
a/k/a “Larry Tate,” and
TARA D. GROOMES**

knowingly sold, transferred, and delivered, and aided and abetted the sale, transfer, and delivery of, counterfeit obligations of the United States, that is, counterfeit \$20 Federal Reserve Notes, with the intent that the counterfeit Federal Reserve Notes be passed, published, and used as true and genuine:

<u>COUNT</u>	<u>DATE</u>	<u>AMOUNT DELIVERED</u>
4	October 9, 2007	\$ 500
5	October 18, 2007	\$ 2,820

In violation of Title 18, United States Code, Sections 473 and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 471 and 473 as set forth in Counts One through Four of this Indictment, defendants

**LARRY V. CRENSHAW,
a/k/a “Larry Tate,” and
TARA D. GROOMES**

shall forfeit to the United States: (a) pursuant to Title 18, United States Code, Section 492, any and all counterfeits of any coins or obligations of the United States, and any articles, devices and other things made, possessed and used in these violations, and any material or apparatus used or fitted or intended to be used in the making of such counterfeits, articles, devices and things; and (b) pursuant to Title 18, United States Code, Section 982(a)(2)(B), any and all property, real and personal, constituting and derived from proceeds obtained directly or indirectly as a result of such violations. This property shall include, but not be limited to:

1. All property used to make, forge, counterfeit and alter any obligation and other security of the United States, including but not limited to the following items that were seized from 6251 Hazel Avenue, Philadelphia, Pennsylvania, on October 18, 2007: (a) 20 genuine \$20 Federal Reserve Notes; (b) 12 genuine \$50 Federal Reserve Notes; (c) one genuine \$10 Federal Reserve Note; (d) a Hewlett Packard Office Jet 7310 all-in-one printer/scanner/copier; (d) one X-acto 12- inch paper cutter; (e) one Identity Guard Paper Shredder; (f) boxes of blank printer paper; and (g) Hewlett Packard ink cartridges.

2. All property, real and personal, involved in or traceable to the violations charged in Counts One through Four of this Indictment;

3. If any of the property described above as being subject to forfeiture as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of defendants LARRY V. CRENSHAW, a/k/a "Larry Tate," and TARA D. GROOMES, up to the value of the forfeiture property listed above.

All pursuant to Title 18, United States Code, Sections 492 and 982, and Title 28, United States Code, Section 2461.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney